

**JASON PELOTTE
ANGLEMEYER vs NORTHAMPTON COUNTY**

August 27, 2020

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| <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>3 ADA ANGLEMEYER, et al)</p> <p>4)</p> <p>5 - vs -) No. 19-3714</p> <p>6)</p> <p>7 NORTHAMPTON COUNTY,)</p> <p>8 et al)</p> <p>9</p> <p>10</p> <p>11 Videotaped Video Teleconference</p> <p>12 Deposition of JASON PELOTTE, held on August 27,</p> <p>13 2020, at 2:34 p.m., before Dolores M. Horne,</p> <p>14 Professional Reporter and Notary Public, in and</p> <p>15 for the Commonwealth of Pennsylvania.</p> <p>16</p> <p>17</p> <p>18 ESQUIRE DEPOSITION SOLUTIONS</p> <p>19 1835 Market Street, Suite 555</p> <p>20 Philadelphia, Pennsylvania 19103</p> <p>21 215-988-9191</p> <p>22</p> <p>23</p> <p>24</p> | <p>1 I N D E X</p> <p>2 WITNESS EXAMINATION PAGE</p> <p>3 JASON PELOTTE</p> <p>4</p> <p>5 By: Mr. Zeiger 5</p> <p>6 By: Mr. Bradford 32</p> <p>7</p> <p>8 E X H I B I T S</p> <p>9 NO. DESCRIPTION PAGE</p> <p>10 Pelotte 1 Callout Report 18</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> |
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| <p>1 APPEARANCES:</p> <p>2</p> <p>3 THE ZEIGER FIRM</p> <p>4 BY: BRIAN ZEIGER, ESQUIRE</p> <p>5 1500 John F. Kennedy Boulevard</p> <p>6 Suite 620A</p> <p>7 Philadelphia, Pennsylvania 19103</p> <p>8 (215) 546-0340</p> <p>9 Attorneys for the Plaintiffs</p> <p>10</p> <p>11</p> <p>12</p> <p>13 PENNSYLVANIA OFFICE OF ATTORNEY GENERAL</p> <p>14 BY: KEVIN BRADFORD, ESQUIRE</p> <p>15 1600 Arch Street</p> <p>16 Suite 300</p> <p>17 Philadelphia, Pennsylvania 19103</p> <p>18 (215) 560-1031</p> <p>19 kbradford@attorneygeneral.gov</p> <p>20 Attorneys for the Defendants</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> | <p>1 DEPOSITION SUPPORT INDEX</p> <p>2</p> <p>3 Direction to Witness Not to Answer</p> <p>4 Page Line Page Line Page Line</p> <p>5</p> <p>6</p> <p>7</p> <p>8 Request for Production of Documents</p> <p>9 Page Line Page Line Page Line</p> <p>10</p> <p>11</p> <p>12</p> <p>13 Stipulations</p> <p>14 Page Line Page Line Page Line</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19 Question Marked</p> <p>20 Page Line Page Line Page Line</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> |

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| <p style="text-align: right;">Page 5</p> <p>1 THE VIDEO TECHNICIAN: We are now 2 on the record. The time is now 2:34 on August 27, 3 2020. This begins the video conference deposition 4 of Jason Pelotte taken in the matter of Ada 5 Anglemeyer, et al, versus Northampton County, et 6 al, filed in the US District Court, Eastern 7 District of Pennsylvania, case number is or Civil 8 Action No. 19-3714. My name is George Ellis. I'm 9 your remote videographer today. The court 10 reporter is Dolores Horne. We are representing 11 Esquire Deposition Solutions. 12 Counsel, please state your name 13 and who you represent after which the court 14 reporter will swear in the witness. 15 MR. ZEIGER: Good morning -- good 16 afternoon, Brian Zeiger for the plaintiffs. 17 MR. BRADFORD: Kevin Bradford for 18 the remaining defendants. 19 JASON PELOTTE, after having been 20 first duly sworn, was examined and testified as 21 follows: 22 * * * 23 EXAMINATION 24 * * *</p> | <p style="text-align: right;">Page 7</p> <p>1 people that entered the home? 2 A. Yes, sir. 3 Q. And when you entered the home, did you 4 use any force? 5 A. No, sir. 6 Q. You didn't use any force against 7 anyone? 8 A. No, sir. 9 Q. Did you observe any other troopers use 10 any force against anyone? 11 A. No, sir. 12 Q. Pardon me, Trooper. 13 MR. ZEIGER: Could we go off the 14 record for a second. 15 THE VIDEO TECHNICIAN: Off the 16 record. The time is 2:37. 17 (Whereupon a break wa taken.) 18 THE VIDEO TECHNICIAN: We're back 19 on the record. The time is 2:39. 20 BY MR. ZEIGER: 21 Q. Trooper, I apologize for that. We're 22 back on record. Okay. Did you have any physical 23 contact with any human beings that were not state 24 troopers at the time the SERT team entered?</p> |
| <p style="text-align: right;">Page 6</p> <p>1 BY MR. ZEIGER: 2 Q. Good afternoon, Trooper. It's corporal? 3 A. Correct. 4 Q. Do you remember being on duty on 5 February 23rd of 2018 working as a Pennsylvania 6 State trooper? 7 A. I do. 8 Q. And do you recall being briefed about an 9 assignment for the SERT team at 04:00 hours? 10 A. Yes, sir. 11 Q. And as a result of whatever that 12 briefing was, did you have an opportunity to go to 13 a house to execute a warrant located at 340 Old 14 Allentown Road in Bushkill Township Northampton 15 County, Pennsylvania? 16 A. Yes, sir. 17 Q. Okay. And as a result of that were you 18 working on the SERT team? 19 A. Yes, sir. 20 Q. And did you enter the -- the home, the 21 living home where people were living as -- as part 22 of your job at 6:00 a.m. in the morning? 23 A. Yes, sir. Probably like 6:05. 24 Q. Understood. And were you one of the</p> | <p style="text-align: right;">Page 8</p> <p>1 A. As I went through the -- I went in 2 through the ground level, sir. And as I moved 3 past, there's -- there was a closet off to my left 4 towards the front of the house. There's a closed 5 door. I opened it. It looked like a walk-in 6 closet fashioned into a bedroom. There's a 7 mattress on the floor and there was like a tiny 8 little man in there, older. I mean, he was 9 getting up out of bed. I asked him to get up. I 10 felt bad for him. I moved him into the living 11 room area where other people were being proned 12 out, and I laid him down on the ground. 13 Q. What does proned out mean? 14 A. Proned out is laying down in a position 15 of disadvantage, your chest to the ground, you 16 know, hands behind, up on your head. 17 Q. And this man, was he a senior citizen? 18 A. I would guess but I do not know. 19 Q. Do you know his name? 20 A. I don't. 21 Q. If I said his name was Richard 22 Anglemeyer, would that refresh your 23 recollection? 24 A. I don't -- I don't recall his name.</p> |

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| <p style="text-align: right;">Page 9</p> <p>1 Q. Okay. Did he seem disoriented or 2 confused? 3 A. Yeah. 4 Q. Did he seem like someone who might have 5 dementia or Alzheimer's? 6 A. I don't -- I can't speak to that. I'm 7 not a doctor. Like he seemed like an old guy, you 8 know. I kind of treated him with kid gloves 9 because of it. 10 Q. I see. Did you have any physical 11 contact with anyone else? 12 A. No, sir. 13 Q. And that older gentleman, you put him on 14 the ground? 15 A. I didn't really have to touch him. 16 Like -- I was like come on out of here. I was 17 talking to him, like you talk to somebody. He 18 wasn't quite understanding. Come out here, you 19 know and then lay down on the ground. And he did. 20 He was -- he complied. So then I passed him off 21 and moved on. 22 Q. Did you put handcuffs on him? 23 A. I did not. 24 Q. Did you put zip ties on him?</p> | <p style="text-align: right;">Page 11</p> <p>1 we put them immediately -- we prone everybody on 2 the ground immediately for -- for two reasons. 3 You know, first it's for safety in case there's 4 any gunfire or anything that would happen up 5 around, you know, the guest or higher level and, 6 second, it's a position of disadvantage because 7 anybody can -- so we don't want them to be able to 8 get at anything quickly. 9 Q. Is there another trooper there named 10 Brian King? 11 A. Yes, sir. 12 Q. Was he standing with you when you put 13 the older gentleman in the prone position on the 14 ground? 15 A. He was in that living room. I'm not 16 sure if he was dealing with -- there's another 17 male there, older male. But I believe he's the 18 one that, you know, said I got him. Like he's 19 good. 20 Q. Can you explain what -- I'm not good 21 with pronouns. It really confuses me. 22 A. Okay. 23 Q. Maybe I'm getting old. But then I'm 24 like -- my brain doesn't function right. Can you</p> |
| <p style="text-align: right;">Page 10</p> <p>1 A. I did not. 2 Q. Did you see anyone handcuff him or zip 3 tie him? 4 A. No. I was the team leader, so I kind of 5 moved on to the next area. 6 Q. How many team leaders were there? 7 A. One for the ground floor and one for the 8 upper floor. 9 Q. How many people entered that residence? 10 A. I couldn't tell you without looking. 11 Q. More than 20 or less than 20? 12 A. Probably around 20, actually. 13 Q. Okay. So, you were responsible for 14 about half of those? You were the team leader for 15 about half of those? 16 A. Correct. 17 Q. And when you put the old man on the 18 ground, did he complain of any pain or anything 19 like that? 20 A. No, sir. 21 Q. Did he say anything about his knee? 22 A. No, sir. 23 Q. And you never put him in a chair? 24 A. I did not put him in a chair. We put --</p> | <p style="text-align: right;">Page 12</p> <p>1 just give the same answer again but say the names 2 of the people? 3 A. Okay. What was the older man's name? 4 Q. Well, I believe his name is Richard 5 Anglemeyer. 6 A. Okay. Well, the little old guy that -- 7 when I escorted him out of the closet and put down 8 on the floor, proned him out, he was in -- he was 9 brought -- the old guy was brought in to the 10 proximity of Corporal King, Brian King. In his 11 proximity, and the fact that he was, you know, a 12 feeble elder gentleman, Brian said I have him, 13 meaning I've got eyes on him. You can move on. 14 Q. I see. And the other gentleman that was 15 in the room, was he in handcuffs or zipped ties? 16 A. I can't recall. 17 Q. If I said his name was Jeffrey 18 Anglemeyer, would that refresh your recollection? 19 A. No. I think he was the paternal figure 20 there. I think he was the father from the 21 briefing, I'm pretty sure. I don't remember his 22 name but he was -- 23 Q. I'm sorry. 24 A. He was in our briefing, the father. He</p> |

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| <p style="text-align: right;">Page 13</p> <p>1 was the one that had the anti police sentiment. 2 He was the one we had initially encountered as we 3 went through the door. 4 Q. Richard Anglemeyer? 5 A. The father. I don't -- 6 Q. The old feeble guy could be -- could be 7 anybody then? 8 A. He was not the father. He was -- he was 9 not -- I don't recall this older little guy from 10 the briefing at all. 11 Q. Okay. He could just be like -- you 12 don't know his identity, I guess, then? 13 A. The little old guy, no. The first guy, 14 he was the father. 15 Q. I see. 16 MR. BRADFORD: That would be -- 17 that's Richard, right, Brian? 18 MR. ZEIGER: The father is 19 Richard, yes. 20 BY MR. ZEIGER: 21 Q. So I guess all of your previous answers 22 where I called him Richard, that was incorrect. 23 A. It was a little old guy. 24 MR. BRADFORD: I don't want to</p> | <p style="text-align: right;">Page 15</p> <p>1 room. You know, we usually get everybody down 2 first, have a look around, you know, and then flex 3 cuff them after, you know, that -- that area is 4 secured. We don't want to do that -- we don't 5 want to be stuck flex cuffing while other things 6 are going on. 7 Q. Understood. And did you hear Corporal 8 King tell -- instruct anyone, give anyone any 9 instructions, any other troopers? 10 A. No, sir. 11 Q. Did you -- did you hear the father 12 figure complain about any pain in his knee? 13 A. It was a -- nondescript. He was 14 complaining. I don't know if it was about his 15 knee, but he was -- he was giving us pretty good 16 lip service. 17 Q. And do you recall any of those words 18 contained in the lip service? 19 A. Just some swear words. But -- and, 20 again, I mean, five seconds in that room, ten tops 21 and then I moved back to the master bedroom and 22 the pool. 23 Q. Did the father seem disoriented like he 24 had dementia or Alzheimer's in your --</p> |
| <p style="text-align: right;">Page 14</p> <p>1 jump in there. But were either of the old guys 2 older than the others? 3 THE WITNESS: The little guy in 4 the closet, I'm not trying to be, you know, 5 condescending but I just -- it was a little poor 6 old guy in the closet like. He was not the 7 father. He was not the suspects from our 8 briefing. 9 BY MR. ZEIGER: 10 Q. That's not Richard. Richard is the 11 father -- 12 A. You said that. I didn't say his name. 13 I don't know his name. 14 Q. Understood. I got it. So, at that 15 time, though, when you entered with the feeble old 16 guy, did you see the father in the room? 17 A. When I brought the feeble old man out of 18 the closet and into the living room, the father 19 was in the living room being addressed by Corporal 20 King. 21 Q. Was the father cuffed or zip tied? 22 A. I don't recall. Not initially and 23 probably not at that point because, you know, this 24 was within ten seconds of entry we were in this</p> | <p style="text-align: right;">Page 16</p> <p>1 A. No. 2 Q. The father seemed totally with it? 3 A. Yeah. 4 Q. All right. Understood. I'm going to 5 share a document with you. Can you see that, 6 Corporal? 7 A. Yes, sir. 8 Q. Can you tell me what this document is, 9 if you know? 10 A. This is my callout report from the 11 incident in question. 12 Q. Okay. And it says activation date in 13 the top right. And that's the day of the 14 incident, correct? 15 A. Correct. 16 Q. And below that it says 2-26-18 date of 17 report. That means that's the day that this 18 report was typed? 19 A. Correct. 20 Q. It has your name, Corporal Jason 21 Pelotte, correct? 22 A. Yes, sir. 23 Q. And it says incident title, warrant 24 service and it has the address of the house,</p> |

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| <p style="text-align: right;">Page 17</p> <p>1 correct?</p> <p>2 A. Yes, sir.</p> <p>3 Q. And it says the amount of time that was</p> <p>4 used, straight time was one hour and overtime was</p> <p>5 five hours; is that right?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. Were you the typist of this</p> <p>8 document or did someone else type it for you?</p> <p>9 A. I typed it.</p> <p>10 Q. Did you have a supervisor review it when</p> <p>11 you submitted it?</p> <p>12 A. No, not when I submitted it. He reviews</p> <p>13 them at his -- at his will once they're submitted.</p> <p>14 Q. Are there any corrections or changes</p> <p>15 made to this document?</p> <p>16 A. No, sir.</p> <p>17 Q. Did you have an opportunity to review</p> <p>18 the document before today's deposition?</p> <p>19 A. Yes, sir.</p> <p>20 Q. And I don't want to hear an answer where</p> <p>21 you communicated with your lawyer. But other than</p> <p>22 that, did you complain or tell anyone that there's</p> <p>23 any mistakes or omissions contained in this</p> <p>24 document?</p> | <p style="text-align: right;">Page 19</p> <p>1 of things there. So what does the word compromise</p> <p>2 mean?</p> <p>3 A. When we move up for a search warrant,</p> <p>4 there's a knock and announce protocol. If we're</p> <p>5 discovered prior to that, a compromise could be</p> <p>6 cameras, lighting, dogs barking, a subject</p> <p>7 moving -- et cetera. So a compromise was called</p> <p>8 because the older white male, the father, was</p> <p>9 looking out at us.</p> <p>10 Q. Where?</p> <p>11 A. From where?</p> <p>12 Q. From where? Where was he when he was</p> <p>13 looking out at you?</p> <p>14 A. He was on the ground level in the front</p> <p>15 of the house. And if you're looking at it from</p> <p>16 the French doors when we were making entry, he</p> <p>17 was -- stood up and was -- you know, it was well</p> <p>18 lit, like on the ground level, about the middle of</p> <p>19 the house looking out at us.</p> <p>20 Q. He was inside the house?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And when he -- when he was looking at</p> <p>23 you, did you see him run or go anywhere or try to</p> <p>24 escape or anything?</p> |
| <p style="text-align: right;">Page 18</p> <p>1 A. No, sir.</p> <p>2 Q. Okay.</p> <p>3 MR. BRADFORD: Can we get this</p> <p>4 marked as Pelotte 1 just for the record?</p> <p>5 MR. ZEIGER: Yes, I agree. Sorry</p> <p>6 about that, Kevin.</p> <p>7 MR. BRADFORD: No problem.</p> <p>8 BY MR. ZEIGER:</p> <p>9 Q. Okay. I'm scrolling down here. Going</p> <p>10 to the second paragraph it says that you -- you</p> <p>11 got a briefing at the Belfast Barracks. And</p> <p>12 that's what happened at 4:00 a.m. in the morning;</p> <p>13 is that right?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And the briefing was given by Corporals</p> <p>16 Chulock -- Chulock and Alaimo?</p> <p>17 A. Alaimo, yes.</p> <p>18 Q. Alaimo. And you were assigned as the</p> <p>19 team leader for the ground level entry team?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Okay. And the next line says, upon</p> <p>22 initiation of the warrant compromise was called</p> <p>23 and I opened the knee high gate for my team and</p> <p>24 then covered as entry was made. There's a couple</p> | <p style="text-align: right;">Page 20</p> <p>1 A. He started to move back away from the</p> <p>2 door.</p> <p>3 Q. You saw that with your own eyes?</p> <p>4 A. Yes. I moved up. I was like -- I moved</p> <p>5 up ahead of everybody because I'm in the front</p> <p>6 seat, opened that knee gate and that put me front</p> <p>7 row center to look into the house.</p> <p>8 Q. What -- what is a knee gate?</p> <p>9 A. It's like a 3 foot gate around the</p> <p>10 property. Did you see pictures of the property?</p> <p>11 Q. Yes, I know the answers, Corporal. My</p> <p>12 job is just to make a record of what it is. I'm</p> <p>13 not allowed to testify. So I just ask you</p> <p>14 questions and you give the answers.</p> <p>15 A. A white vinyl 3 foot gate with a latch</p> <p>16 on it, probably to keep they're, you know, the</p> <p>17 Chihuahuas in.</p> <p>18 Q. And so -- so, who called the compromise?</p> <p>19 Were you the person who called it?</p> <p>20 A. No, sir.</p> <p>21 Q. So this is what I'm a little confused</p> <p>22 about. So you tell me you're the person who made</p> <p>23 the observation of the compromise but you're not</p> <p>24 the person who called it, so you had told someone</p> |

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| <p style="text-align: right;">Page 21</p> <p>1 there was a compromise?</p> <p>2 A. I -- I relayed it to the team via radio.</p> <p>3 Everybody is carrying like equipment -- when</p> <p>4 you -- one of the -- there's the old guy and I put</p> <p>5 out on the radio compromise. I mean, if you're --</p> <p>6 getting into specifics, I keyed up my radio and</p> <p>7 called compromise to the team, if that makes more</p> <p>8 sense. I didn't initially spot him. It drew my</p> <p>9 attention to him and then I called it. Does that</p> <p>10 make sense?</p> <p>11 Q. Yes. And then when you opened the knee</p> <p>12 high gate for your team, next it says then covered</p> <p>13 as entry was made. What does that mean, then</p> <p>14 covered as entry mean?</p> <p>15 A. Then I rifle up and I'm looking at</p> <p>16 windows up above, any openings that -- that aren't</p> <p>17 covered by a weapon.</p> <p>18 Q. So, when -- when you guys went near the</p> <p>19 house and you opened this -- this three foot gate,</p> <p>20 is that by foot or in a vehicle?</p> <p>21 A. That was by foot.</p> <p>22 Q. I see. How far away was the vehicle</p> <p>23 from the fence?</p> <p>24 A. Probably -- I'm trying to recall</p> | <p style="text-align: right;">Page 23</p> <p>1 about five or six questions ago?</p> <p>2 A. If that's what I told you, yes, sir.</p> <p>3 Q. I beg your pardon. I didn't mean it</p> <p>4 that way. I apologize. I didn't mean it that</p> <p>5 way. That was the answer you gave me to the</p> <p>6 question I asked you about five or six questions</p> <p>7 ago?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Okay. And it's the same white male?</p> <p>10 A. Yes, sir.</p> <p>11 Q. The one you identified today as the</p> <p>12 father?</p> <p>13 A. Yes, sir.</p> <p>14 Q. As you moved inside, he disobeyed</p> <p>15 commands to show his hands and lie down. That's</p> <p>16 the -- that's still the father, right?</p> <p>17 A. Yes.</p> <p>18 Q. The subject moved deeper into the house.</p> <p>19 I followed the team into the center of the house</p> <p>20 and we had an encounter with three subjects. But</p> <p>21 this subject moved deeper into the house is still</p> <p>22 the father, correct?</p> <p>23 A. Yes, sir.</p> <p>24 Q. And then I followed the team into the</p> |
| <p style="text-align: right;">Page 22</p> <p>1 exactly. But I'd say about 20 yards, 25 yards.</p> <p>2 Q. So, you all are on foot. And then</p> <p>3 you -- you open the gate so the team can go in?</p> <p>4 A. Correct.</p> <p>5 Q. That's why you're number eight or</p> <p>6 nine?</p> <p>7 A. Our team kind of over look at</p> <p>8 everything. So, you're looking over top but I'm</p> <p>9 also seated up in front of the vehicle so I can</p> <p>10 get up there, hit that knee gate and open it --</p> <p>11 Q. Was everyone able to get inside the gate</p> <p>12 area?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And then did you go inside the gate</p> <p>15 area?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And did the gate close behind you?</p> <p>18 A. I don't recall, sir. I don't know if it</p> <p>19 was on a spring or not.</p> <p>20 Q. The next line says, at the doorway I</p> <p>21 observed an older WNM looking at us from the</p> <p>22 center of the house. Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. And that's the same story you told me</p> | <p style="text-align: right;">Page 24</p> <p>1 center of the house and we had encountered three</p> <p>2 subjects at this point, a younger WNM, an older</p> <p>3 WNM and an older WNF. Okay?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Do you know the identities of those</p> <p>6 three people as we sit here today?</p> <p>7 A. I don't, sir.</p> <p>8 Q. Okay. The younger WNM, did that person</p> <p>9 have any contact with any troopers that you</p> <p>10 know?</p> <p>11 A. I mean, troopers detained all three of</p> <p>12 these people.</p> <p>13 Q. Okay. Do you know which trooper</p> <p>14 interacted with the younger WNM?</p> <p>15 A. I don't, sir.</p> <p>16 Q. And the older WNM, is that the father?</p> <p>17 A. Yes, sir.</p> <p>18 Q. And the older WNF, did you later learn</p> <p>19 that was the mother?</p> <p>20 A. Yes, sir.</p> <p>21 Q. And is the WNF the one that had an</p> <p>22 encounter with Trooper Painter?</p> <p>23 A. Yes, sir.</p> <p>24 Q. And the younger WNM, you have no idea</p> |

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| <p style="text-align: right;">Page 25</p> <p>1 what trooper that person interacted with?</p> <p>2 A. No, sir.</p> <p>3 Q. And the older WNM, the father, did that</p> <p>4 person have an interaction with Trooper</p> <p>5 McGarvey?</p> <p>6 A. I can't speak to that. All I know --</p> <p>7 all I recall is Corporal King addressing him.</p> <p>8 Like we encountered them, but I was eighth or</p> <p>9 ninth back. So there was a lot of guys, so I kind</p> <p>10 of bypassed and looked at an open or closed door</p> <p>11 that might have another --</p> <p>12 Q. Okay. Then as they were being detained</p> <p>13 by others, I opened a door to a closet that had</p> <p>14 been fashioned into a bedroom and observed an</p> <p>15 older white non Hispanic male. You wrote that?</p> <p>16 A. Yes, sir.</p> <p>17 Q. That's the older feeble gentleman?</p> <p>18 A. Yes, sir.</p> <p>19 Q. I brought him into the main living room</p> <p>20 area with the others and proned him out on the</p> <p>21 floor. That means you -- you laid him out stomach</p> <p>22 touching the floor, hands and feet spread?</p> <p>23 A. Yes. And, again, I didn't lay him out</p> <p>24 like -- again, I didn't really ever touch him. I</p> | <p style="text-align: right;">Page 27</p> <p>1 toward the back of the house, there was a pool</p> <p>2 area, like a swimming pool.</p> <p>3 Q. Indoor pool?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And it says, we cleared the pool area</p> <p>6 with no contact. That means there was no human</p> <p>7 being in the pool area?</p> <p>8 A. Correct.</p> <p>9 Q. Corporal Chulock advised me that his</p> <p>10 team cleared the game room area next. Okay. Next</p> <p>11 it says, I then advised CP of my head count for</p> <p>12 the ground floor and completed secondary searches</p> <p>13 on my level. CP, is that Corporal Chulock?</p> <p>14 A. CP is the command post, a vehicle --</p> <p>15 they're usually, you know, still on the roadway.</p> <p>16 That's got the boss in it. We let him know how</p> <p>17 many people we came into contact with and mine was</p> <p>18 for the ground floor.</p> <p>19 MR. BRADFORD: Ground floor means</p> <p>20 the lower level, right?</p> <p>21 THE WITNESS: Yeah. We always</p> <p>22 have problems with these split level type houses.</p> <p>23 We call it ground level, first level --</p> <p>24 MR. BRADFORD: I'm trying to keep</p> |
| <p style="text-align: right;">Page 26</p> <p>1 was worried about him. He was so old. But, yes,</p> <p>2 he -- he laid down on the floor, got to the</p> <p>3 ground.</p> <p>4 Q. He was cooperative?</p> <p>5 A. Yes, sir.</p> <p>6 Q. I then joined additional members pushing</p> <p>7 through a bedroom on the two side to the indoor</p> <p>8 pool area on the two, three corner. We cleared</p> <p>9 the pool area with no contact. What does two side</p> <p>10 mean and what does two, three corner mean?</p> <p>11 A. We label houses -- we label them by</p> <p>12 their sides. The one side was the side -- any</p> <p>13 side of the house that faces the main roadway.</p> <p>14 The two side would be clockwise, kind of around --</p> <p>15 anything that -- and you're facing the house to</p> <p>16 the left, you know, picture a square. So the two</p> <p>17 side would be that side. I wish I had a compass</p> <p>18 direction to give you. But it would be the one</p> <p>19 side facing the road, two side would be the left</p> <p>20 side, the four side would be the right side and</p> <p>21 the three side would be the backside. So the two</p> <p>22 side it was like a master bedroom, went through</p> <p>23 the hallway to the master bedroom and then that</p> <p>24 master bedroom was clear and then if I looked</p> | <p style="text-align: right;">Page 28</p> <p>1 this lower level and upper level just to avoid</p> <p>2 that confusion.</p> <p>3 THE WITNESS: Okay. Lower level</p> <p>4 would be my ground floor.</p> <p>5 MR. BRADFORD: I'm sorry. Go</p> <p>6 ahead, Brian.</p> <p>7 BY MR. ZEIGER:</p> <p>8 Q. And what was the head count you gave</p> <p>9 him?</p> <p>10 A. I don't recall that specifically. But I</p> <p>11 think in this case four total, three males one</p> <p>12 female.</p> <p>13 Q. Then it says completed secondary</p> <p>14 searches on my level. What is a secondary</p> <p>15 search?</p> <p>16 A. Secondary search, you know, we initially</p> <p>17 go through, you know, people either present</p> <p>18 themselves or in their places that they would</p> <p>19 normally be, you know, upright, laying in a bed,</p> <p>20 sitting in a chair. Secondary search are, you</p> <p>21 know, behind things where people can hide or, you</p> <p>22 know, in cabinets, behind furnaces, places people</p> <p>23 would hide is a secondary search.</p> <p>24 Q. Did you find anything?</p> |

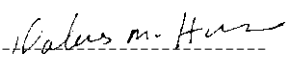
JASON PELOTTE
ANGLEMEYER vs NORTHAMPTON COUNTY

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| <p style="text-align: right;">Page 29</p> <p>1 A. No, sir.</p> <p>2 Q. All subjects were gathered in the living</p> <p>3 room area and a medic was requested to respond for</p> <p>4 the female. Why was the medic requested for the</p> <p>5 female?</p> <p>6 A. When everybody is gathered -- when I</p> <p>7 came back, the female was complaining about her</p> <p>8 back. And we have Tac medics that can come into a</p> <p>9 house and assess the injury and let us know, okay,</p> <p>10 we need to -- we need ALS or we need anything</p> <p>11 more. So, based on her complaints, we brought a</p> <p>12 medic.</p> <p>13 Q. What happened?</p> <p>14 A. They came in, assessed her and</p> <p>15 eventually she required an ambulance. I think it</p> <p>16 was something with her back.</p> <p>17 Q. Did you see how she injured her back?</p> <p>18 A. I did not.</p> <p>19 Q. Did you see Trooper Painter have any</p> <p>20 contact with her?</p> <p>21 A. I did not. I know he was headed that</p> <p>22 way. He headed that -- I believe she was in the</p> <p>23 hallway. I know he was headed that way. They</p> <p>24 were headed that way.</p> | <p style="text-align: right;">Page 31</p> <p>1 A. No, sir.</p> <p>2 Q. Have you ever requested in writing or</p> <p>3 oral, email, text, anything to anyone that you be</p> <p>4 given a body cam?</p> <p>5 A. No, sir.</p> <p>6 Q. Why not?</p> <p>7 A. That's not -- that's above my pay grade,</p> <p>8 sir.</p> <p>9 Q. I know that, Corporal. I meant it more</p> <p>10 on the lines of have you ever just asked someone,</p> <p>11 hey, why -- why don't I have one, I'd like one?</p> <p>12 MR. BRADFORD: Objection; asked</p> <p>13 and answered. Can you answer again.</p> <p>14 THE WITNESS: No, sir.</p> <p>15 BY MR. ZEIGER:</p> <p>16 Q. Do you know what a body cam is?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Do you believe on the day of this job</p> <p>19 that you did anything wrong?</p> <p>20 A. No, sir.</p> <p>21 Q. If the father figure in this case claims</p> <p>22 he was injured as a result of his interaction with</p> <p>23 Pennsylvania State Police, do you have any</p> <p>24 knowledge of that?</p> |
| <p style="text-align: right;">Page 30</p> <p>1 Q. Did you see any weapons on her?</p> <p>2 A. No, sir.</p> <p>3 Q. Did you later learn that she had any</p> <p>4 weapons on her?</p> <p>5 A. No, sir.</p> <p>6 Q. On the father, the guy that you have</p> <p>7 been referring to the whole time, did you see any</p> <p>8 weapons on him?</p> <p>9 A. No, sir.</p> <p>10 Q. Did you later learn he had any weapons</p> <p>11 on him?</p> <p>12 A. No, sir.</p> <p>13 Q. Next it says, I advised Corporal Chulock</p> <p>14 that we were ready for investigators soon after</p> <p>15 the scene and detainees were relinquished to</p> <p>16 investigators and we exited the premises. We then</p> <p>17 returned to PSP Belfast and debriefed. And after</p> <p>18 that, is that the end?</p> <p>19 A. Yes, sir.</p> <p>20 Q. One second, please. Did you have a body</p> <p>21 cam on?</p> <p>22 A. No, sir.</p> <p>23 Q. Did you ever have a body cam on working</p> <p>24 for the Pennsylvania State Police?</p> | <p style="text-align: right;">Page 32</p> <p>1 A. No, sir.</p> <p>2 MR. ZEIGER: I have nothing</p> <p>3 further.</p> <p>4 BY MR. BRADFORD:</p> <p>5 Q. Just one question, Corporal. Did you</p> <p>6 attend the briefing that took place before the --</p> <p>7 before this search warrant was executed?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And are you aware that there's videos of</p> <p>10 that, video recordings of that -- the briefing?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Did you attend that entire briefing?</p> <p>13 A. I did, sir.</p> <p>14 MR. BRADFORD: That's -- that's</p> <p>15 all I have.</p> <p>16 MR. ZEIGER: Be safe, Corporal.</p> <p>17 Nice day, thank you for your time.</p> <p>18 THE VIDEO TECHNICIAN: This is</p> <p>19 George. One moment. Same orders, Counsel?</p> <p>20 MR. ZEIGER: Yes.</p> <p>21 MR. BRADFORD: Yes.</p> <p>22 THE VIDEO TECHNICIAN: We are now</p> <p>23 going off the record, 3:07 p.m. on August 27,</p> <p>24 2020.</p> |

JASON PELOTTE
ANGLEMEYER vs NORTHAMPTON COUNTY

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| <p>Page 33</p> <p>1 (Witness excused.) 2 (Deposition concluded at 3:07 3 p.m.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> | |
| <p>Page 34</p> <p>1 C E R T I F I C A T E 2 3 I hereby certify that the witness 4 was duly sworn by me and that the deposition is a 5 true record of the testimony given by the witness. 6 7 8 9  10 Dolores M. Horne 11 Dated: September 4, 2020 12 13 14 15 (The foregoing certification of this transcript 16 does not apply to any reproduction of the same by 17 any means, unless under the direct control and/or 18 supervision of the certifying shorthand reporter.) 19 20 21 22 23 24</p> | |